

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

VERONICA KARIUKI,

Plaintiff,

v.

ETeAM, INC.,

Defendant.

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Case No. 1:15-cv-00934-TSE-JFA

**DEFENDANT ETEAM, INC.'S INITIAL DISCLOSURES**

Defendant eTeam, Inc. ("eTeam"), by counsel, Carr Maloney P.C., hereby makes its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT MAY BE USED TO SUPPORT ETEAM'S DEFENSES**

**Veronica Kariuki**  
1027 C Margate Court  
Sterling, VA 20164

Information includes: events alleged in the Complaint; communications with eTeam; educational history; employment history; efforts to find employment since August 5, 2013; alleged damages; alleged emotional and mental injuries.

**Kumar Nagdev**  
Address is currently unknown

Information includes: events alleged in the Complaint.

**Ben Thakur**  
eTeam, Inc.  
1001 Durham Avenue, Suite 201  
South Plainfield, NJ 07080  
732-248-1900 ext. 206

Information includes: eTeam's recruiting and hiring practices.

Defendant eTeam reserves the right to supplement this response as discovery progresses.

## II. CATEGORIES AND LOCATION OF DOCUMENTS

Defendant eTeam has attached all documents described in the Rule as Exhibit 1. Defendant eTeam reserves the right to supplement this response as discovery progresses.

## III. COMPUTATION OF DAMAGES

Defendant eTeam does not currently claim any damages in relation to this action. Defendant eTeam reserves the right to supplement this response as discovery progresses.

## IV. INSURANCE

Defendant eTeam has attached all documents described in the Rule as Exhibit 2.

ETeAM, INC.  
By counsel

CARR MALONEY P.C.

/s/ Tina M. Maiolo  
Tina M. Maiolo, Esquire (VSB # 40512)  
Carr Maloney P.C.  
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Suite 450  
Washington, DC 20036  
(202) 310-5500 (Telephone)  
(202) 310-5555 (Facsimile)  
tm@carrmaloney.com  
*Counsel for Defendant eTeam, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing *Defendant eTeam, Inc.'s Initial Disclosures* was electronically filed this 2nd day of December, 2015 and served electronically upon:

J. Andrew Baxter  
Merritt J. Green  
Connie M. Ng  
General Counsel, P.C.  
6849 Old Dominion Drive, Suite 220  
McLean, Virginia 22101

/s/ Tina M. Maiolo  
Tina M. Maiolo